September 5, 2024

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: Wireless Telecommunications Bureau and Office of Engineering and Technology Seek Comment on NextNav Petition for Rulemaking – WT Docket No. WT Docket No. 24-240; RM-11989

Dear Ms. Dortch:

I am writing on behalf of Sensurance, a company that works with insurance companies in the U.S. to significantly reduce the risk and costs associated with water leaks in structures.

We are members of the Z-Wave Alliance, which assists our company in taking our property technology solutions to market. As such, we are deeply concerned about the potential negative impacts of NextNav's proposal on both our company and the broader connected device marketplace. This proposal will severely undermine existing IoT device networks in homes and businesses across the United States, as well as stifle innovation and competitive advantages for hundreds of American startups and small to medium companies.

Sensurance currently manufactures the following Z-Wave-certified devices:
- Water leak detectors
- Flood / freeze detectors
- Water shut off devices

Thousands of these devices are currently deployed in U.S. households. NextNav's proposal threatens the continuing operation of these devices, as well as our ability to develop new products that interoperate with our existing device ecosystem.

The removal of interference testing requirements for part 15 devices is an existential threat to our device ecosystem. The nationwide creation of a high-power service such as a PNT network in the 902-928 MHz band would disrupt the low-power communications Z-Wave devices rely on for efficient operations. The performance and range of our device ecosystem would be decimated, reneging on the capabilities promised to our users. The impact to our low power networks would cause immense maintenance and support costs, not to mention customer satisfaction concerns.

Accommodating our devices in another spectrum band is not an option. The current Z-Wave band was deliberately chosen to avoid interference with other wireless protocols frequently used in household and office settings, such as Wi-Fi and Bluetooth. We have generations of z-wave products in production. Relocating an entire ecosystem to another spectrum band would reduce reliability and eliminate backwards compatibility with currently deployed Z-Wave devices.

If accepted, this proposal would force our company and countless others to radically redesign our products at significant and potentially insurmountable cost. The result of such a redesign would be irrevocable damage to our customers, business, and reputation as a trusted provider of IoT solutions. U.S. consumers would be burdened with the cost of replacing devices. Any new solution we offered would not be backwards-compatible or interoperable with existing solutions, alienating customers. The inevitable impression would be that our products are unreliable.

Despite the fact that our devices have operated in this band for the past three years, we have not received any outreach from NextNav to discuss mitigation strategies. The lack of any specific strategies to ensure co-existence with existing Part 15 devices in the NextNav proposal, as well as the request to eliminate interference protections, belies a future in which IoT devices are effectively crowded out of the 902-928 MHz band.

Sensurance urges the FCC to consider the broader implications of NextNav's proposal for U.S. consumers and businesses. Maintaining the current interference testing requirements is essential not only for protecting the small businesses that contribute to the American economy but also for ensuring a vibrant and competitive technology landscape that benefits all.

Thank you for your attention to this critical issue.

Sincerely,
/s/ Colin Blair

Colin Blair
Sensurance